

## PROPOSAL EVALUATION

### *Proposition 50, Chapter 8 Integrated Regional Water Management Planning Grant*

PIN	5476	COUNTY	San Diego
APPLICANT	Borrego Water District	AMOUNT REQUESTED	\$498,900
PROJECT TITLE	Plan of Development of a Conjunctive Use (Water Banking) Project in Borrego Valley, CA	TOTAL PROJECT COST	\$498,900

#### PROJECT DESCRIPTION

The Borrego Water District proposes to develop a conjunctive use project. The purpose of the project is two fold: to protect the Borrego Springs community from future water shortages and to provide a water storage "bank" for water districts, enabling them to reduce their dependence on imported water supplies during dry year water allocations.

**WORK PLAN - Scoring will be based on whether the applicant has a detailed and specific work plan that adequately documents the proposal. Weighting factor is 3.**

**Score: 6**

**Comment:** The work plan lays out work items for a feasibility study using 5 study elements and each element has multiple work items. Deliverables are listed. A schedule and budget are included. The schedule shows a performance period. The applicant states that IRWMP adoption will be at the end of the 15 month project schedule, March 2007. However, this work plan is for a feasibility study and not for the creation of an IRWMP and it is not clear that it would be a component of an IRWMP. It would have been better for the applicant to build a case that its GWMP serves as the basis for an IRWMP with some modification and broadening of partnerships making the feasibility study and other coordination activities more obviously components of an IRWMP.

**DESCRIPTION OF REGION - Scoring will be based on whether the applicant has presented a detailed and specific description that adequately documents the region. Weighting factor is 1.**

**Score: 2**

**Comment:** The applicant did not address the following items, as required by PSP: 1) sensitive habitats and impaired water bodies within the region; 2) important ecological processes and environmental resources; 3) social and cultural makeup of the regional community; and 4) important cultural or social values and economic conditions and trends within the region. The applicant did not describe the benefits of planning for this region and managing water within the region as compared to individual local efforts.

**OBJECTIVES - Scoring will be based on whether the applicant has presented detailed and specific planning objectives. Weighting factor is 2.**

**Score: 6**

**Comment:** Regional planning objectives were explained. The applicant addressed major water related objectives and conflicts in the region; however, the applicant did not discuss any of the issues regarding statewide priorities. The objectives were taken from the applicant's GWMP. It appears as though the applicant selected four objectives out of the GWMP that they felt were applicable to the grant.

**INTEGRATION OF WATER MANAGEMENT STRATEGIES - Scoring will be based on whether the applicant has adequately documented how water management strategies will be integrated. Weighting factor is 2.**

**Score: 6**

**Comment:** The water management strategies put forward by the applicant are: improved groundwater management, implementation of conjunctive use, implementation of water transfers/importation of water, habitat protection and improvement, water supply reliability, and resolve conflicts between water rights holders. Other strategies listed in the guidelines are not considered. In addition, the applicant states in the work plan that if implementing conjunctive use proves successful, then the other strategies would follow. It appears that these are not strategies to be implemented synergistically, but rather, benefits of a successful conjunctive use program.

**IMPLEMENTATION - Scoring will be based on whether the applicant has adequately detailed plan implementation. Weighting factor is 2.**

**Score: 4**

**Comment:** Applicant only marginally addressed any of the criteria in the Guidelines. The applicant presents a general sense of items to address after the grant work is completed, but it does not constitute a general schedule. There is no mention of a mechanism for monitoring IRWMP implementation or adaptation to circumstance. The institutional structure is unclear, although the applicant mentions agreements that will be put into place with basin water rights holders and outside agencies.

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**IMPACTS AND BENEFITS - Scoring will be based on whether the applicant has adequately presented and documented the impacts and benefits of the Plan. Weighting factor is 2.**

**Score: 4**

**Comment:** There is no discussion of CEQA process. More discussion is needed that analyzes the potential benefits of developing the proposal and the potential impacts within the region and adjacent areas. The applicant uses generalities that are unsupported. The claim of the significant and beneficial impact on species in the State Park is unsupported in the application, although a reference is made to the GWMP analysis. It was not even explained what near surface water levels means and how species benefit. Would management of the water level consider variations of water level for habitat benefit or constant high water levels for maximum storage?

**DATA AND TECHNICAL ANALYSIS - Scoring will be based on whether the applicant has presented detailed and specific data and technical analysis components of the proposal. Weighting factor is 1.**

**Score: 2**

**Comment:** Available data seems lacking. Some tasks listed are geared towards investigations and site analyses to be conducted. Task B7 mentions a feasibility study that could be pursued. There is discussion of how status of existing water quantity and water quality monitoring will be assessed. The applicant makes general statements about data and technical analysis. The applicant states that where data gaps exist, water quality data will be obtained through sampling. Task A3 is an additional sampling task. For budgeting purposes 15 well sites are proposed for general mineral analysis. There is not sufficient supporting information in the application to determine if 15 samples for general minerals is adequate to support the work proposed.

**DATA MANAGEMENT - Scoring will be based on whether the applicant has presented detailed and specific data management procedures. Weighting factor is 1.**

**Score: 2**

**Comment:** The applicant did not discuss how data management efforts will support statewide data needs. It seems that data management will be accomplished using the applicant's existing DMS. The applicant states that their DMS is compatible with the SWAMP and GAMA. No further information is given regarding the DMS and the ability or intent to share data with other stakeholders.

**STAKEHOLDER INVOLVEMENT - Scoring will be based on whether the applicant has adequately documented stakeholder involvement concerns. Weighting factor is 1.**

**Score: 3**

**Comment:** The applicant includes a discussion of involvement of public and community organizations. The work plan includes a Stakeholder Coordination and Involvement Task; however, it seems that the identification of stakeholders' task is focused on major groundwater producers. The involvement of community groups, although mentioned, seems general and the mechanisms by which community groups would participate and actually influence decisions is not well presented or supported. Environmental justice concerns are not addressed. It is not clear if all appropriate stakeholders are included.

**DISADVANTAGE COMMUNITIES - Scoring will be based on whether the applicant has adequately documented disadvantaged community concerns. Weighting factor is 1.**

**Score: 3**

**Comment:** The applicant meets the MHI requirement for DACs. Water supply needs are stated as the groundwater basin is in overdraft. A benefit to the DAC is stated as avoidance of future cutbacks in water. The applicant refers to Task D2 for involvement of DACs which seems to focus on major groundwater producers. The benefits to DAC section seems like it could be expanded. The avoidance of future cutback would accrue to the region and are not direct to the needs of DACs.

**RELATION TO LOCAL PLANNING - Scoring will be based on whether the applicant has adequately documented the Plan's relationship to local planning efforts. Weighting factor is 1.**

**Score: 2**

**Comment:** The applicant states that this region relies on San Diego County for land use and water planning. Two county policies currently exist regarding development in the region, but there is very little discussion on how these policies relate to the IRWM strategies. More points would have been assigned if the applicant would have presented more information on how the local agency planning documents will relate to the IRWM strategies.

**AGENCY COORDINATION - Scoring will be based on whether the applicant has adequately documented agency coordination issues. Weighting factor is 1.**

**Score: 2**

**Comment:** The application needs more detail regarding provisions for coordination and cooperation with the relevant local, State, and federal agencies. The applicant briefly touched upon how the IRWMP will facilitate coordination with local land-use planning decision-makers in this section and in Task D2 of the work plan. The applicant states that other agencies are interested at this time, but more investigation is needed to look into this project before the agencies determine if they will still be interested. From the discussion provided in the application, it does not appear as though there is complete agreement yet.

**TOTAL SCORE: 42**